

From: [Mark Reinsel](#)
To: [DEQ WQP Admin](#)
Subject: Circular DEQ-12B comments
Date: Tuesday, April 01, 2014 1:59:26 PM
Attachments: [DEQ comments--MAR.doc](#)

Please find attached my comment letter on Circular DEQ-12B.

Thank you,

Mark

Mark Reinsel, Ph.D., P.E.
Apex Engineering, PLLC
4050 Fieldstone Crossing
Missoula, MT 59802
(406) 493-0368 phone/fax
(406) 459-2776 cell
<http://apexengineering.us>
www.linkedin.com/pub/mark-reinsel/20/5b4/160



Apex Engineering, PLLC

4050 Fieldstone Crossing
Missoula, MT 59802
<http://apexengineering.us>

Phone: 406-493-0368
Fax: 406-493-0368
mark@apexengineering.us

April 1, 2014

Re: Comments on DEQ Circular 12B

Ms. Carrie Greeley
Department of Environmental Quality
1520 E. Sixth Avenue
P.O. Box 200901
Helena, MT 59620-0901
deqwqpadmin@mt.gov

To Whom It May Concern:

As a consulting engineer specializing in water treatment, I read with interest the new Circular DEQ-12B and the associated solicitation for public comment. Although not part of the Nutrient Work Group, I have been well aware of its activities over the past several years. I agree with both concepts presented in Circular 12A (some tightening of nutrient standards) and Circular 12B (possible granting of variances to prevent unnecessary economic expense).

While specializing in water treatment technologies for almost 20 years, I constantly research and evaluate new technologies, so I am well aware of the “availability of reasonable alternatives” discussed in New Rule I(5). I believe that experts such as myself will be able to assist DEQ and dischargers in arriving at treatment solutions to either avoid the need for variances or to minimize their duration. One of my consulting clients is Floating Island International, which has a simple, cost-effective technology for nitrogen and phosphorus removal that may be applicable in many situations. I have also designed, evaluated and optimized more “high-tech” approaches for nutrient removal that may be applicable in other cases.

Sincerely,

Mark A. Reinsel, Ph.D., P.E.
President
Apex Engineering, PLLC